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9 **[Additional defendants and counsel
10 listed on signature pages]**

11 UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
13 (SAN FRANCISCO DIVISION)

14
15 IN RE TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Case No. M 3:07-md-1827 SI; MDL 1827
Individual Case No. 3:10-cv-0117 SI

16
17 This Document Relates To Individual Case No.:
3:10-cv-0117 SI

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING ANSWERS TO
AMENDED COMPLAINT**

18 ELECTROGRAPH SYSTEMS, INC.;
19 ELECTROGRAPH TECHNOLOGIES, CORP.

Honorable Susan Illston

20 Plaintiffs,

21 v.

22 EPSON IMAGING DEVICES CORPORATION,
et al.

23 Defendants.
24

25 WHEREAS, plaintiffs Electrograph Systems, Inc. and Electrograph Technologies, Corp.
26 (“Electrograph”) filed the above captioned lawsuit on November 6, 2009 (“Complaint”);
27
28

1 WHEREAS, defendants Hitachi, Ltd., Hitachi Displays, Ltd., Hitachi Electronic Devices
 2 (USA), Inc., Epson Imaging Devices Corporation, Epson Electronics America, Inc., Sharp
 3 Corporation, Sharp Electronics Corporation, Toshiba Corporation, Toshiba America Electronic
 4 Components, Inc., Toshiba America Information Systems, Inc., Toshiba Mobile Display Co.,
 5 Ltd., LG Display Co., Ltd., LG Display America, Inc., AU Optronics Corporation, AU Optronics
 6 Corporation America, Samsung Electronics Company, Ltd., Samsung Semiconductor, Inc.,
 7 Samsung Electronics America, Inc. and HannStar Display Corporation (“Stipulating Defendants”)
 8 filed answers to the Complaint on March 15, 2010;

9 WHEREAS, pursuant to this Court’s order dated August 29, 2011 on Mitsui & Co.
 10 (Taiwan), Ltd.’s (“Mitsui Taiwan”) motion for judgment on the pleadings for lack of personal
 11 jurisdiction, which granted Electrograph “leave to amend its complaint to set forth its theory of
 12 jurisdiction” over Mitsui Taiwan (MDL Dkt. No. 3395), Electrograph filed an amended complaint
 13 on September 23, 2011 (“Amended Complaint”) identical to the Complaint with regard to
 14 allegations concerning the Stipulating Defendants, but adding allegations regarding defendant
 15 Mitsui Taiwan;

16 WHEREAS, response(s) to the Amended Complaint must be filed by October 10, 2011;

17 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
 18 undersigned counsel, on behalf of their respective clients, Electrograph, on the one hand, and the
 19 Stipulating Defendants on the other hand, as follows:

20 1. Stipulating Defendants’ respective answers, filed on March 15, 2010, to the allegations
 21 in Electrograph’s Complaint are hereby deemed responsive to the corresponding allegations in
 22 Electrograph’s Amended Complaint and no further responsive pleading on behalf of the
 23 Stipulating Defendants to Electrograph’s Amended Complaint shall be required.

24 2. To the extent Electrograph’s Amended Complaint contains any additional or
 25 substantively revised allegations to which a response may be deemed to be required from the
 26 Stipulating Defendants, such allegations are hereby deemed denied.

1 Dated: October 5, 2011

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38 *Inc. and Electrograph Technologies, Corp.*

FILER'S ATTESTATION

I, Kent M. Roger, am the ECF user whose identification and password are being used to file this Stipulation and [Proposed] Order. In compliance with General Order 45.X.B, I hereby attest that Michael Lazertwitz, Christopher Nedeau, Melvin Goldman, Hugh Bangasser, Robert Wick, John Grenfell, John Chung, and Philip Iovieno concur in this filing.

/s/ Kent M. Roger

Kent M. Roger

Attorneys for Defendants Hitachi, Ltd., Hitachi Displays, Ltd., and Hitachi Electronic Devices (USA), Inc.

[PROPOSED] ORDER

Pursuant to the parties' stipulation set forth above and pursuant to Rule 6-1(a) of the Civil
Local Rules, IT IS SO ORDERED.

Dated: October __⁶, 2011

By 
HON. SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE